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October 12, 2022

Via CM/ECF

Hon. Jessica S. Allen, U.S.M.J.
United States District Court for the District of New Jersey

**Re: Progressive Spine & Orthopaedics, LLC v. National Association of Letter
Carriers Health Benefit Plan
Civil Action No.: 22-4597 (WJM)(JSA)**

Dear Magistrate Judge Allen:

We apologize for missing the prior letter deadline as to jurisdictional discovery. The parties are now proposing that jurisdictional discovery be conducted on the following schedule:

1. By October 21, 2022, Plaintiff shall send Defendant jurisdictional interrogatories and document production requests.
2. By November 21, 2022, Defendant shall provide responses to Plaintiff's interrogatories and document production requests.
3. By December 21, 2022, the parties shall meet and confer about any discovery deficiencies, the need for depositions, and send a discovery status letter to the Court.

/s/ Jordan B. Dascal
Jordan B. Dascal, Esq.
Dascal Law LLC
Attorney for Plaintiff

/s/ Michael S. Adler
Michael S. Adler, Esq.
Cohen Weiss and Simon LLP
Attorney for Defendant

SO ORDERED.

s/Jessica S. Allen
Hon. Jessica S. Allen, U.S.M.J.
Dated: October 13, 2022